UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

IN RE

AIR CARGO SHIPPING SERVICES ANTITRUST LITIGATION

MDL No. 1775

06-MD-1775 (JG) (VVP)

THIS DOCUMENT RELATES TO: All Actions

PLAINTIFFS' NOTICE OF MOTION AND MOTION TO AUTHORIZE DISTRIBUTION OF ADDITIONAL FUNDS

PLEASE TAKE NOTICE THAT, upon the Supplemental Declaration of Jennifer M.

Keough Re: Air Cargo 2 Settlement Claims Administration, dated May 10, 2012 ("Supplemental Keough Declaration"), along with its supporting exhibit and the Memorandum in Support of Plaintiffs' Motion to Authorize Distribution of Additional Funds, and all other papers and proceedings here, Plaintiffs will move this Court on a date and time to be set by the Court, before the Honorable John Gleeson, United States District Judge, at the United States Courthouse, 225 Cadman Plaza East, Brooklyn, New York, pursuant to Rule 23 of the Federal Rules of Civil Procedure, to enter an order authorizing the distribution of additional funds in accordance with Exhibit 1 to the Supplemental Keough Declaration. Oral argument on this motion, if any, will be held on a date and time set by the Court.

Respectfully submitted,

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Dated: May 10, 2012